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11
12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 MATTHEW R. WALSH

15 Plaintiff,

16 vs.

17 ROKOKO ELECTRONICS, and
DOES 1 through 50, inclusive,

18 Defendant.

Case No.: 2:25-cv-05340-ODW-RAO

[Assigned to Hon. Otis D. Wright, II,
Courtroom 5D; Hon. Rozella A. Oliver,
Courtroom 590]

19 **DEFENDANT ROKOKO**
20 **ELECTRONICS' OPPOSITION TO**
21 **PLAINTIFF MATTHEW R.**
22 **WALSH'S MOTION TO EXTEND**
23 **PAGE LIMITATIONS FOR**
24 **MOTION FOR SUMMARY**
25 **JUDGMENT**

26 Date: December 22, 2025
27 Time: 1:30 p.m.
28 Place: Dept. 590

State Court Action Filed: May 12, 2025
Removal Date: June 12, 2025
Trial Date: None

1 **MEMORANDUM OF POINTS AND AUTHORITY**

2 **I. INTRODUCTION**

3 Plaintiff Matthew R. Walsh’s (“Plaintiff”) Motion to Extend Page Limitations
4 for Motion for Summary Judgment (“Motion”) against Defendant Rokoko
5 Electronics (“Rokoko”) improperly seeks leave to file an oversized brief in support
6 of a “forthcoming” motion for summary judgment. Plaintiff has not met and
7 conferred with Rokoko pursuant to L.R. 7-3, nor has he demonstrated exceptional
8 circumstances warranting a summary judgment motion more than double the length
9 permitted under L.R. 11-6. Plaintiff’s Motion must be denied.

10 **II. ARGUMENT**

11 Plaintiff has not met and conferred with Plaintiff’s pursuant to L.R. 7-3, and
12 thus his Motion is procedurally deficient. Plaintiff asked if Rokoko would be
13 willing to stipulate to a page limit extension on November 25, 2025, but Plaintiff
14 never offered to meet and confer prior to filing his Motion. (Declaration of
15 Katherine J. Ellena, Ex. A). Plaintiff then asked Rokoko to disregard his request to
16 stipulate before Rokoko responded and proceeded to file his Motion without a meet
17 and confer. (*Id.*)

18 Furthermore, Plaintiff’s Motion is unwarranted insofar as it requests an
19 “approximately 61 page motion to be filed” – more than double the typical 25-page
20 summary judgment brief permitted under L.R. 11-6. “Given the district court’s
21 inherent power to control their dockets, whether to grant leave to exceed the page
22 limits set forth in the [Local Rules] appears to be at the full discretion of the Court.”
23 *Traylor Bros., Inc. v. San Diego Unified Port Dist.*, 2012 U.S. Dist. LEXIS 40977,
24 *6; *see also Swanson v. U.S. Forest Serv.*, 87 F.3d 339, 345 (9th Cir. 1996) (courts
25 have discretion to strike oversized briefs). Plaintiff does not demonstrate
26 exceptional need or good cause as to why his arguments cannot be presented within
27 the standard limit through editing or consolidation. Plaintiff’s bare contentions that

1 he cannot adequately present the issues in fewer than 61-pages is not a grounds to
2 grant an extension. This Court should therefore exercise its discretion and deny
3 Plaintiff's Motion.

4 **III. CONCLUSION**

5 For all of the reasons explained herein, Rokoko respectfully requests this Court
6 deny Plaintiff's Motion.

7
8 DATED: December 1, 2025

REED SMITH LLP

9
10 By: /s/ Katherine J. Ellena
11 Katherine J. Ellena
12 Michael Galibois (*pro hac vice*)
13 Emily Graue (*pro hac vice*)

14 *Attorneys for Defendant*
15 *Rokoko Electronics*

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CERTIFICATE OF COMPLIANCE

The undersigned, counsel of record for Defendant Rokoko Electronics, certifies that this Memorandum of Points and Authorities contains 342 words, which complies with the word limit of L.R. 11-6.2.

DATED: December 1, 2025

/s/ Katherine J. Ellena
Katherine J. Ellena